

PETER C. McMAHON (State Bar No. 161841)
KATHERINE DEBSKI (State Bar No. 271528)
McMAHON SEREPCA LLP
985 Industrial Road, Suite 201
San Carlos, CA 94070
Telephone: (650) 637-0600
Facsimile: (650) 637-0700
Email: peter@msllp.com; katherine@msllp.com

Attorneys for Defendants
WILLIAM FISCHER AND UPPER ORBIT, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SUZANNE D. JACKSON,

Plaintiff,

v.

WILLIAM FISCHER; JON SABES;
STEVEN SABES; DAVID GOLDSTEEN;
MARVIN SIEGEL; BRIAN CAMPION;
LONNIE BOOKBINDER; CHETAN
NARSUDE; MANI KOOLASURIYA;
JOSHUA ROSEN; UPPER ORBIT, LLC;
SPECIGEN, INC.; PEER DREAMS, INC.,
NOTEBOOKZ, INC., ILEONARDO.COM,
INC.; NEW MOON, LLC; MONVIA, LLC;
and SAZANI BEACH HOTEL,

Defendant.

Case No. 3:11-cv-02753-JSW

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT;
DECLARATION OF PETER C.
McMAHON IN SUPPORT THEREOF**

1 Plaintiff Suzanne Jackson ("Plaintiff") and defendants William Fischer
2 ("Fischer") and Upper Orbit, LLC ("Upper Orbit"), by and through their counsel, and subject to
3 the Court's approval, stipulate as follows:

4 WHEREAS, on or about August 31, 2011, Fischer and Upper Orbit voluntarily
5 accepted service of Plaintiff's complaint through their Minnesota counsel;

6 WHEREAS, Fischer and Upper Orbit have requested an extension of time to
7 answer or otherwise respond to the complaint;

8 WHEREAS, Plaintiff has previously agreed to extend time to answer or otherwise
9 respond to the complaint to October 11, 2011 for defendants Marvin Siegal, Jon Sabes, Steven
10 Sabes, Chetan Narsude, Mani Kulasooriga, Monvia, LLC, and David Goldsteen;

11 WHEREAS, Plaintiff has likewise agreed to extend Fischer's and Upper Orbit's
12 time to answer or otherwise respond to the complaint to October 11, 2011;

13 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND
14 BETWEEN THE PARTIES that defendants Fischer and Upper Orbit shall answer or otherwise
15 respond to the complaint on or before October 11, 2011.

16 Dated: September 21, 2011

/s/ Peter C. McMahon

Peter C. McMahon
MCMAHON SEREPKA LLP
Attorneys for Defendants
William Fischer & Upper Orbit, LLC

17 Dated: September 21, 2011

/s/ Robert J. Stumpf

Robert J. Stumpf
SHEPPARD MULLIN ET AL.
Attorneys for Plaintiff Suzanne Jackson

18 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

19 Dated: September 21, 2011


The Hon. Jeffrey S. White